

ADMINISTRATIVE RECORD

Addendum to the Response Action Work Plan Flower Creek Removal Plan Libby, Montana

1.0 Introduction

This addendum to the Response Action Work Plan Revision 2 (RAWP) (CDM Federal Programs Corporation [CDM] 2008) includes creek-specific characterization data. Specific remedial activities to be performed along this creek are detailed on the following Contract Drawings:

- Flower Creek Site Location Plan (SL-1)
- Flower Creek Site Access Plans (SA-1 through SA-6)
- Flower Creek Remediation and Restoration Plans (RR-1 through RR-6)
- Flower Creek General Notes (G-1)
- Flower Creek Detail Plan (D-1)

Removal and restoration activities will be conducted in accordance with the RAWP Revision 2 and this RAWP Addendum, forthwith referred to as the Contract Documents. All project quality assurance and quality control requirements for measurement reports will be addressed in a future data summary report.

2.0 General Information

- Only government-authorized personnel will be permitted on site during the removal and restoration activities. For public safety, residents that may be displaced will not be allowed to return to their property unless given permission or accompanied by a government representative. If the resident returns to their property without prior approval, their relocation agreement with the government will be nullified and per diem and hotel costs will not be paid. If an emergency arises and the resident requires items from inside the house (medication, etc.) they should contact their Community Involvement Coordinator at 293-1433 for arrangements to be made to retrieve the item.
- CDM staff will maintain all unoccupied properties, which include but are not limited to, feeding fish and/or cats daily and watering indoor plants weekly, until the resident is allowed to return to the property.
- Areas restored along the creek embankments will be composed primarily of riprap material and should not require landscaping maintenance.

■ If the owner or resident has questions or concerns, he or she should contact the Community Involvement Coordinator at 293-1433.

3.0 Background Information

Flower Creek is centrally located in the city of Libby, Montana and discharges runoff from local forested, rural, and urban areas to the Kootenai River. Headwaters of the creek originate within the Cabinet Mountain Wilderness. In addition, Flower Creek is located approximately 1.25 miles west of Granite Creek, which contains similar fish and wildlife habitat. Embankment rehabilitation is planned during the summer of 2008 by the United States Army Corps of Engineers (USACE) for Granite Creek.

Several investigations were completed along the 2.5-mile section of Flower Creek adjacent to residential and commercial properties that flow through the Libby municipality. This portion of the creek is predominantly comprised of washed river rock, native vegetation, and other native fill materials.

The spatial boundaries of the investigations were as follows:

- Upstream Limit: Southern property boundary of 823 Flower Creek Road
- Downstream Limit: Outlet to the Kootenai River

A summary of the findings from investigations performed by CDM in 2007 and 2008 are as follows:

- Vermiculite was observed in Areas A through N during the site inspection using Standard Operating Procedure CDM Libby-06. These areas are primarily composed of riprap material and loose gravel.
- Vermiculite was not observed along portions of the creek bank between known areas with contamination and downstream of the Balsam Street Bridge.
- The focus of the field investigation along Flower Creek was to determine presence of vermiculite and amphibole along the embankments. Due to the limited quantities of soil available, no soil samples were collected or analyzed for Libby Amphibole (LA).

4.0 Remediation and Restoration

Remediation and restoration activities will be performed as described on the contract drawings. Site activities will consist of the following:

- Contractor will access contaminated material areas via adjacent residential properties. Some clearing may be required.
- All excavation activities within the approximate location of contaminated material will be completed as directed by the government representative. Exact location of contaminated material may vary from contract drawings and will be verified in field.

- Remediation will include the excavation and proper disposal of all identified riprap and soil material.
- Excavation activities may be required outside of the approximate location of contaminated material. Any additional excavation activities will be directed by the government representative.
- Restoration activities will be performed after remedial activities and confirmation soil sampling has been completed, in accordance with the RAWP Revision 2.
- Restoration will include backfilling all affected areas with appropriate fill
 material, as discussed in the contract drawings and as directed by the government
 representative.

5.0 Environmental Impacts

At this time, a biological evaluation (BE) has not been completed within the reach where contaminated material has been identified. Due to the close proximity to and similarities in fish and wildlife habitat with Granite Creek, all construction work will follow the best management practices (BMP's) established within the BE completed for Granite Creek (USACE 2008) and as discussed in the Project Information Report for Granite Creek (USACE 2007). A biologist will not be onsite or available during construction. Visual monitoring of water quality will be performed; however, no water quality sampling will be conducted.

Remedial activities will consist of the removal and restoration of contaminated material at varying depths from both embankments along several segments of Flower Creek upstream of the Balsam Street Bridge. In addition, several boulders containing contaminated material will be removed from the creek bed. Construction work will be performed within the work window of July 15 to August 31, as established by the Montana Fish, Wildlife and Parks and US Fish and Wildlife Service to coincide with when aquatic species of concern, including bull trout, are least likely to be in the area.

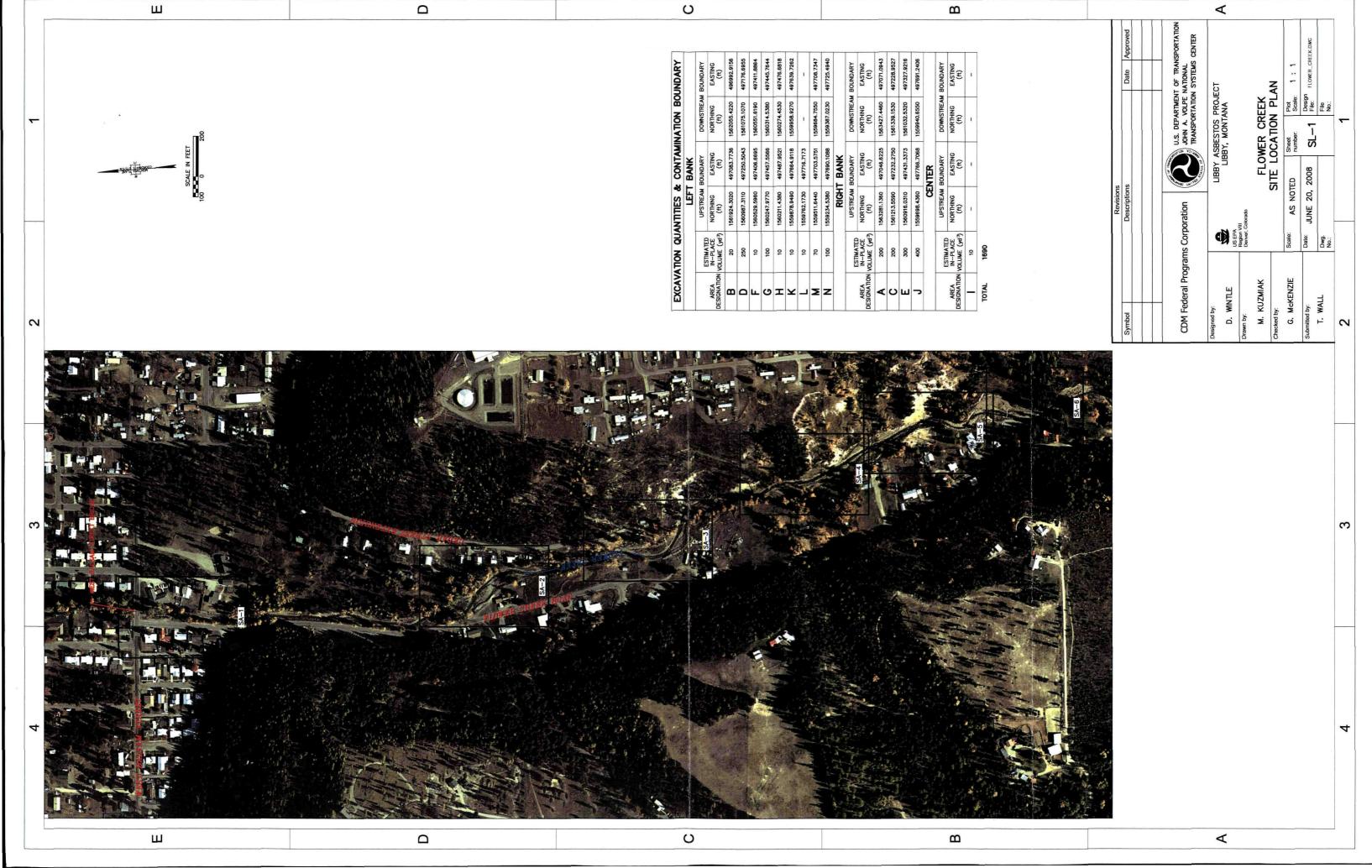
By adhering to these construction BMP's, it is expected that adverse effects to the creek are not likely to occur and that a post-evaluation will not be necessary.

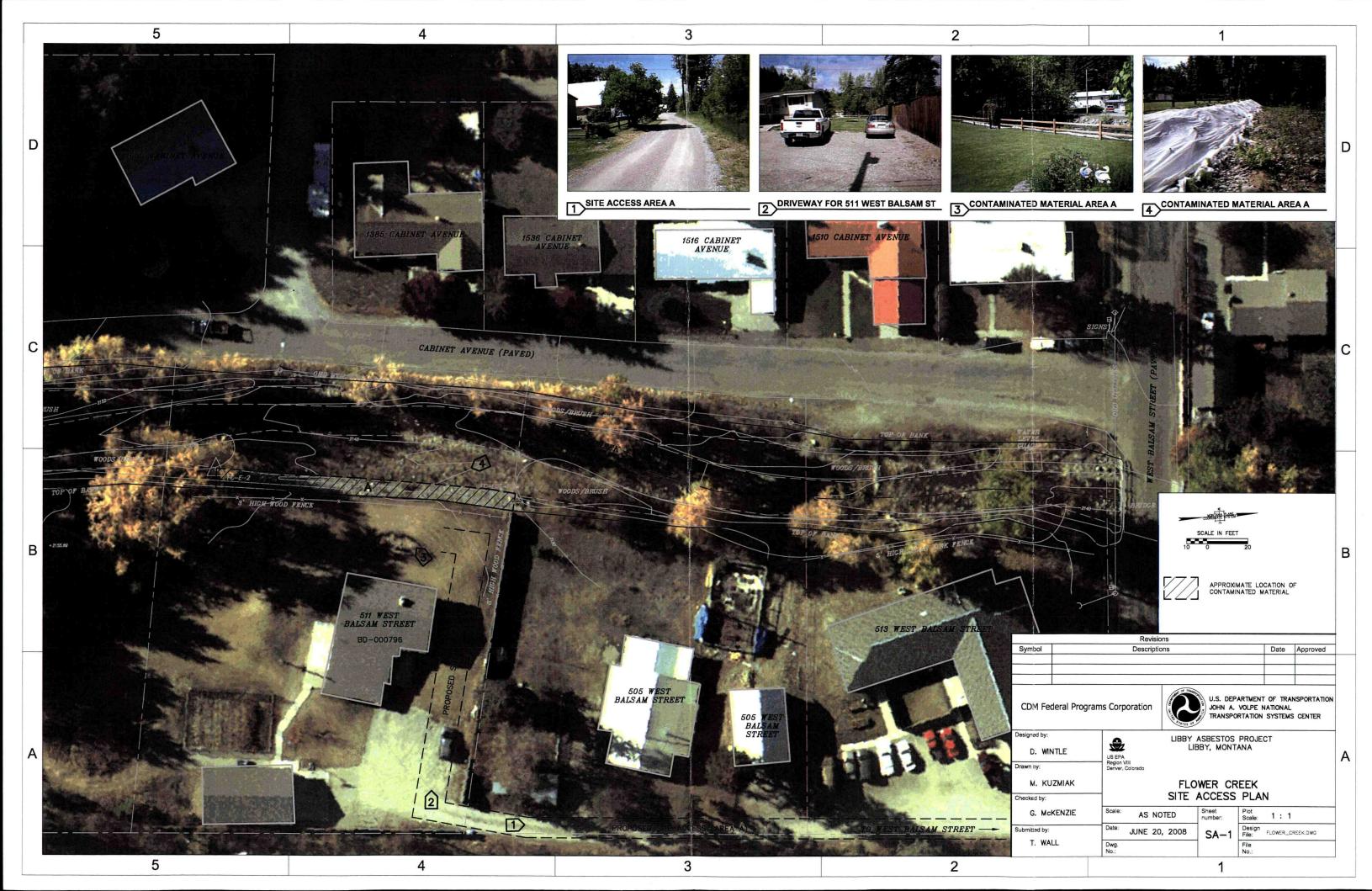
6.0 References

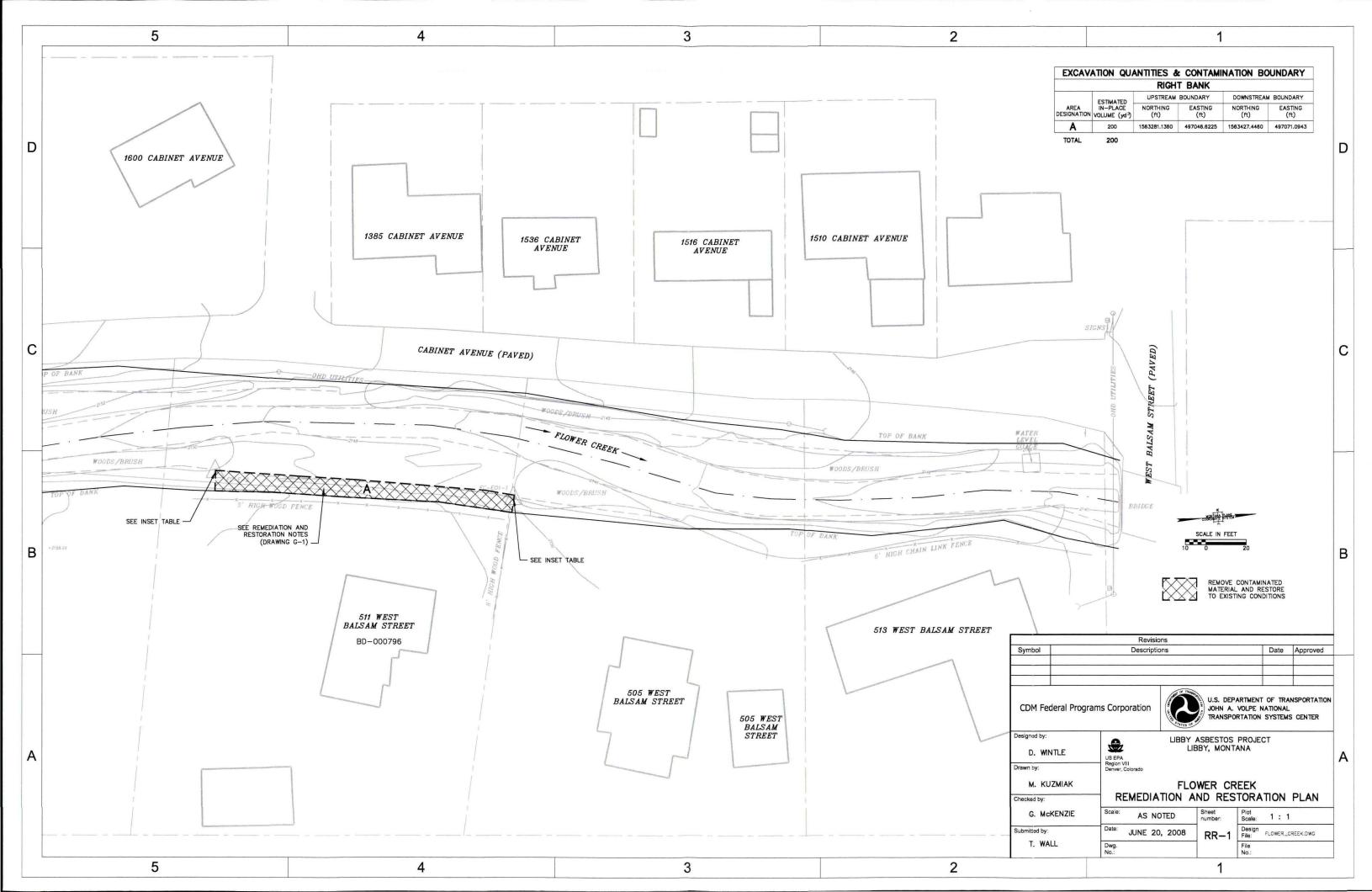
CDM 2008. Response Action Work Plan Revision 2, U.S. Environmental Protection Agency (EPA) Libby Asbestos Project, Libby, Montana. Prepared for EPA by Volpe and CDM. February.

USACE 2007. Project Information Report Rehabilitation of Damaged Flood Control Works, Seattle District, Granite Creek, Libby, Montana. Prepared by USACE. November.

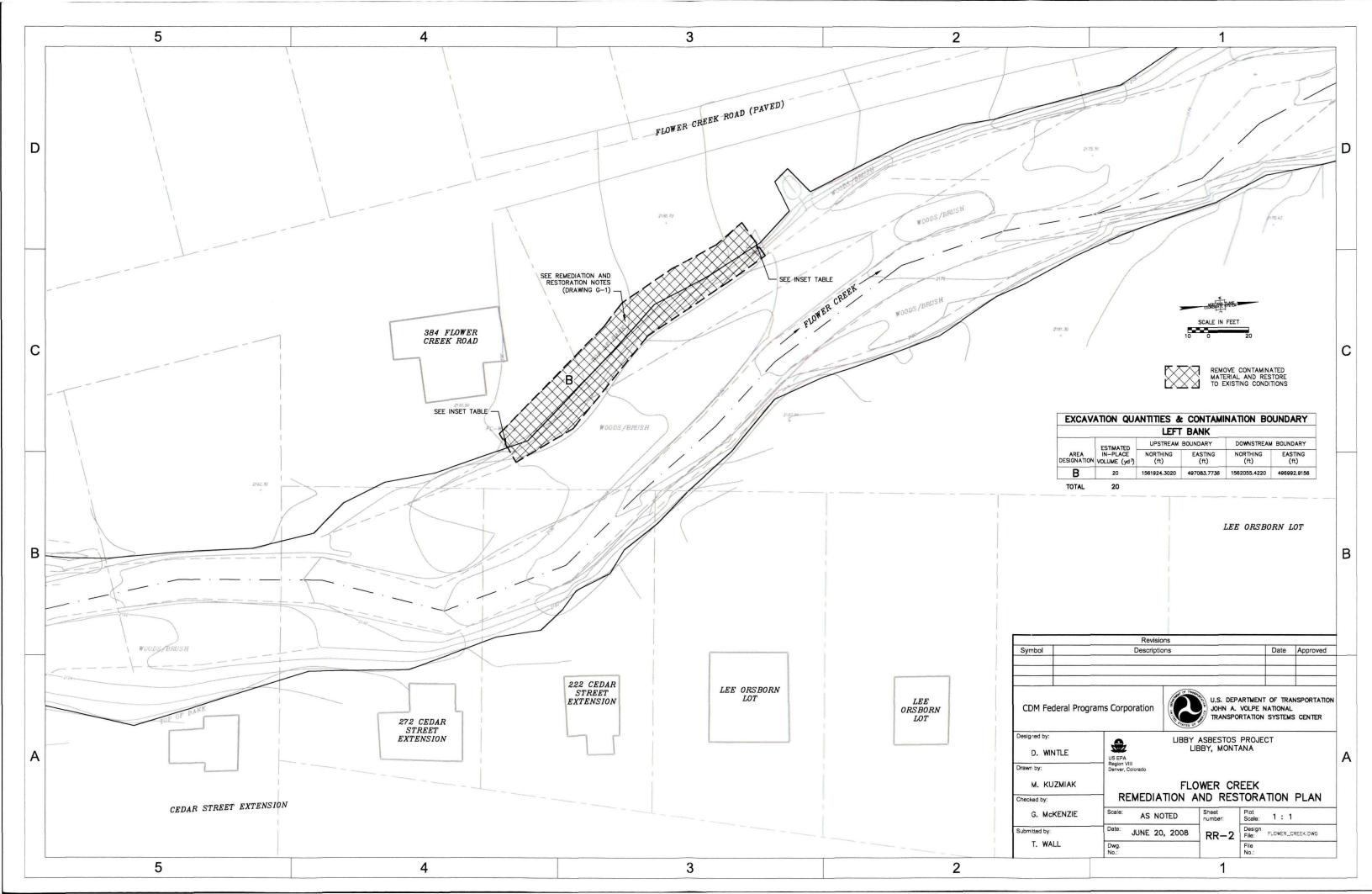
_____ 2008. Biological Evaluation, 2008 Levee Rehabilitation Program, Big Cherry Creek (Granite Creek Levee), Lincoln County, Montana. March.

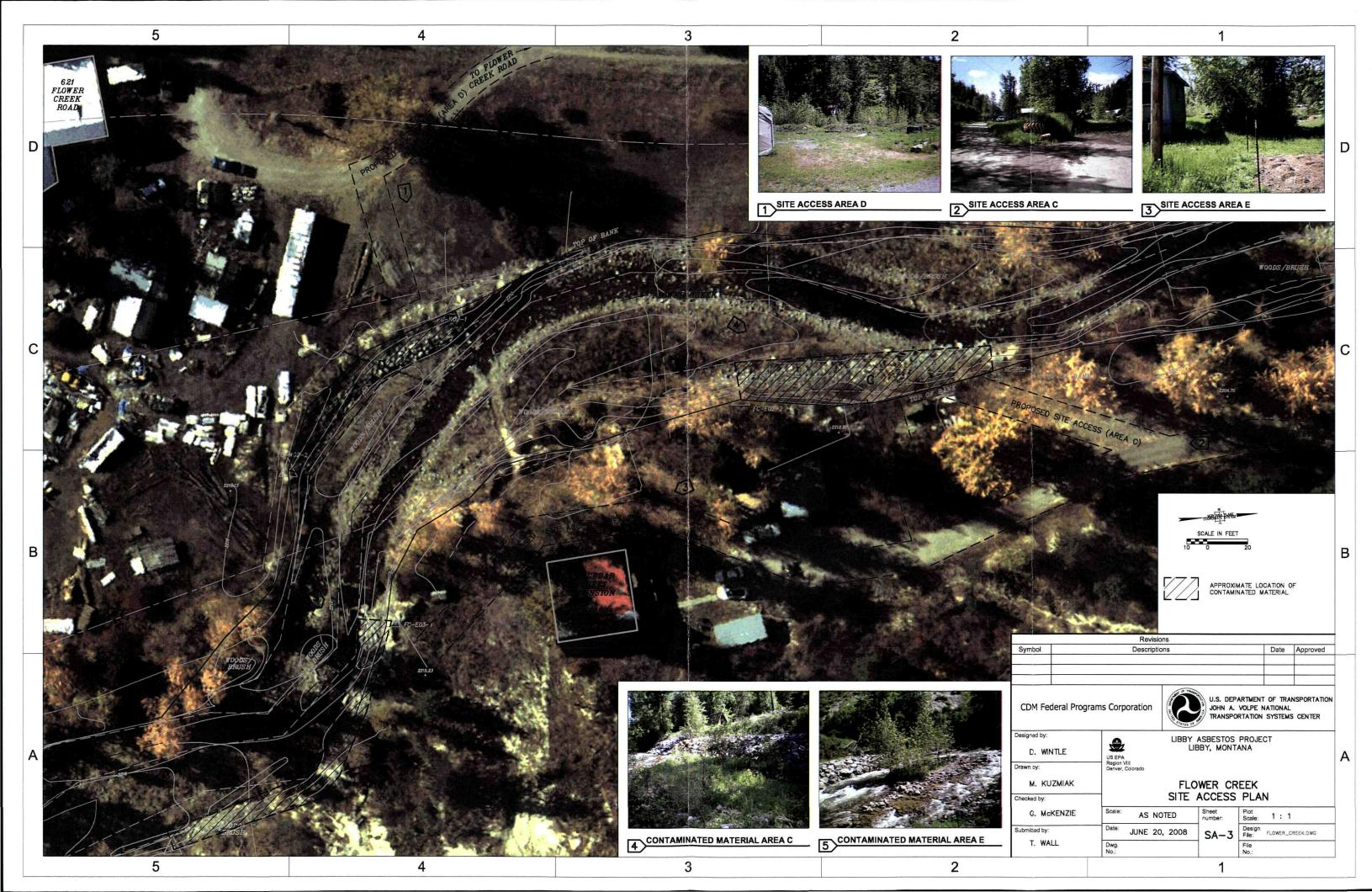


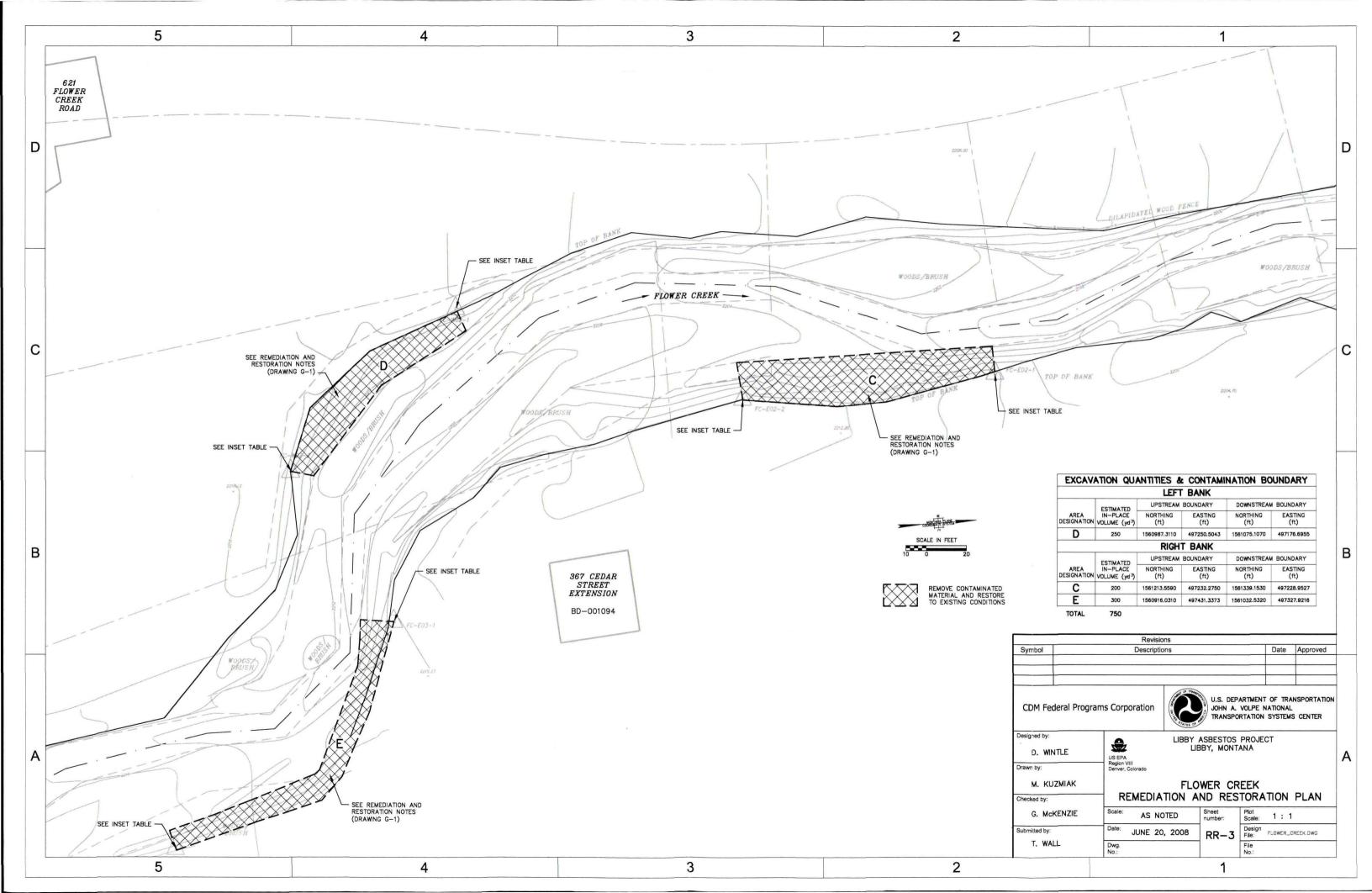




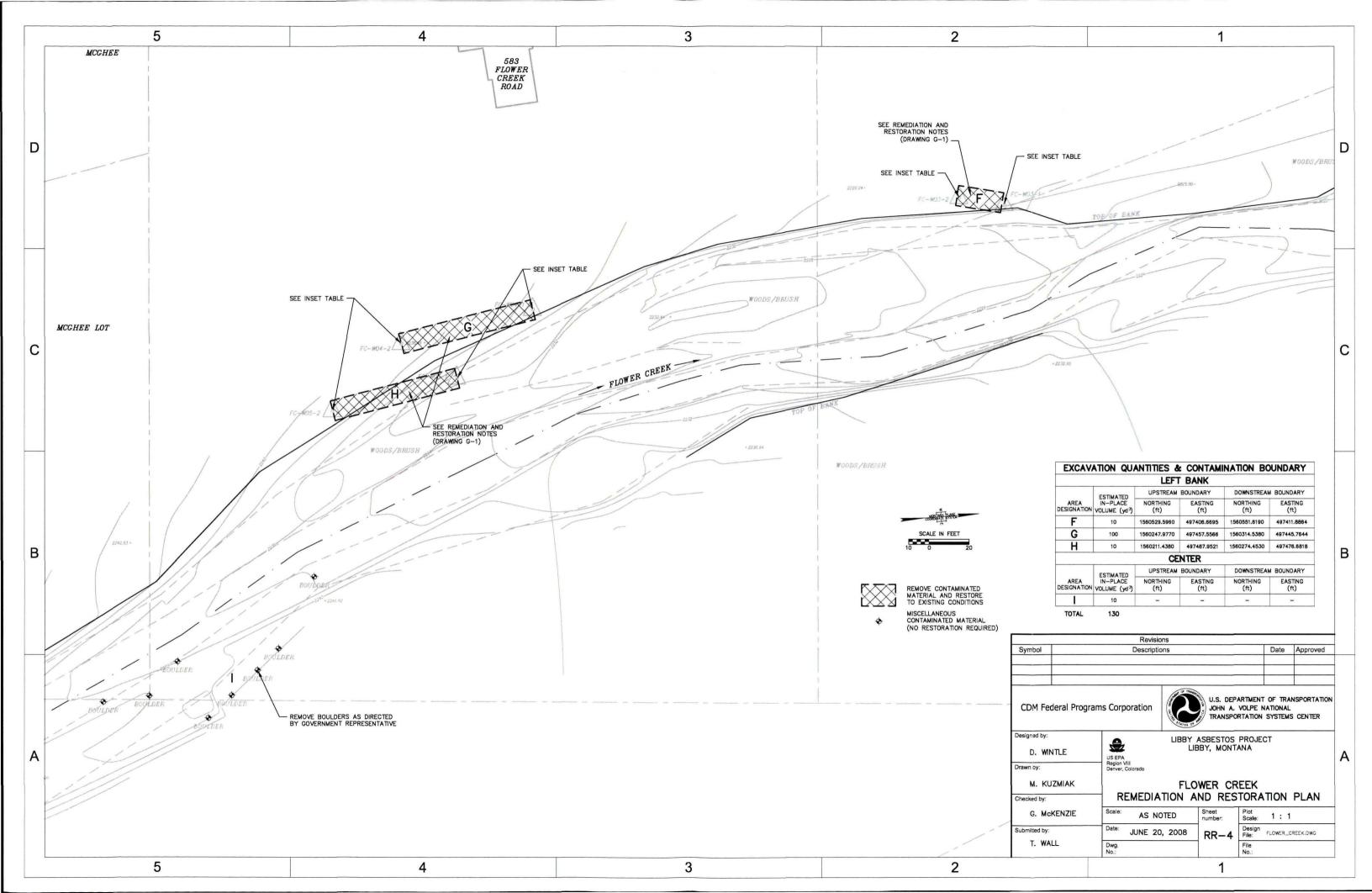




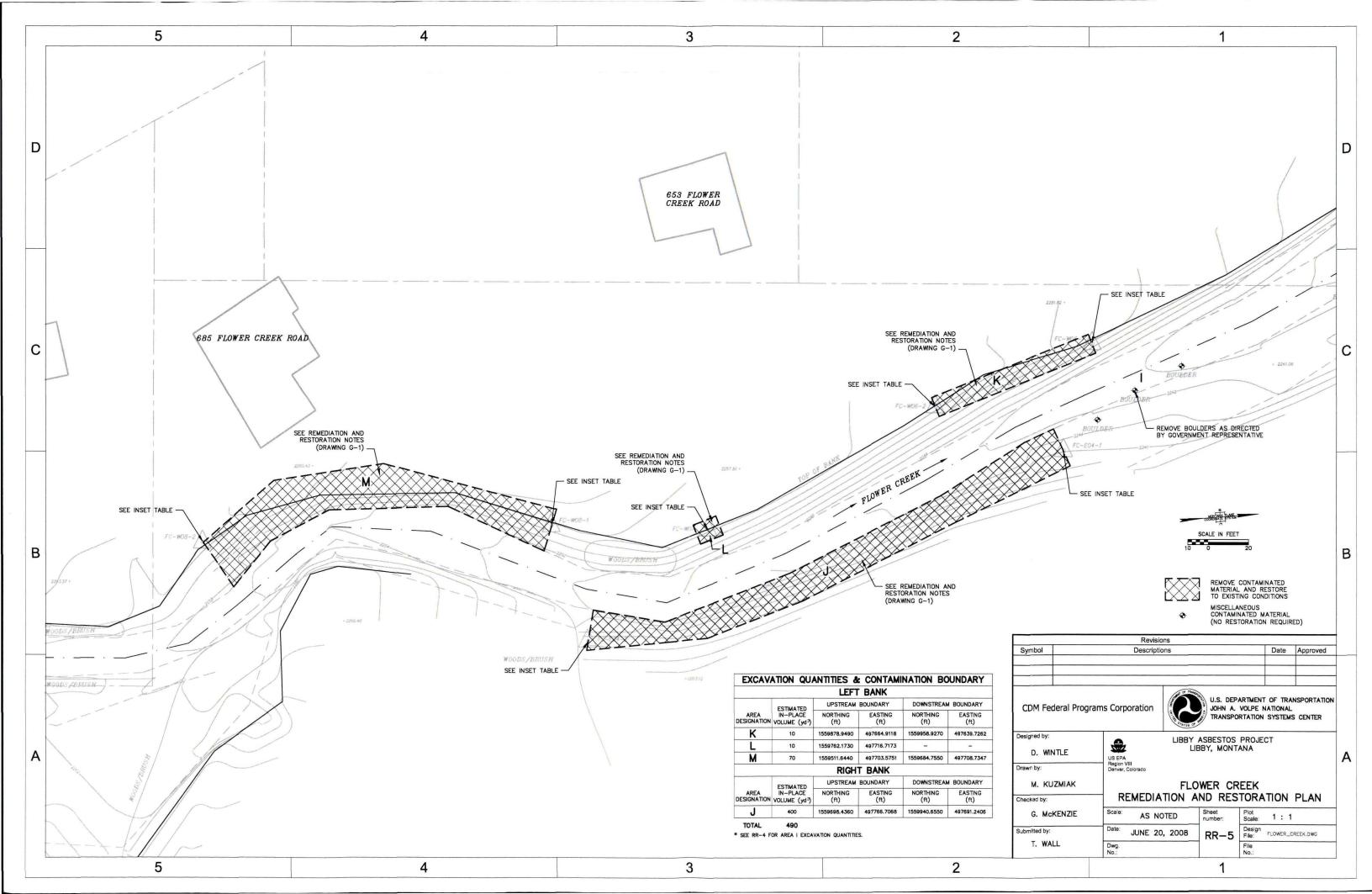


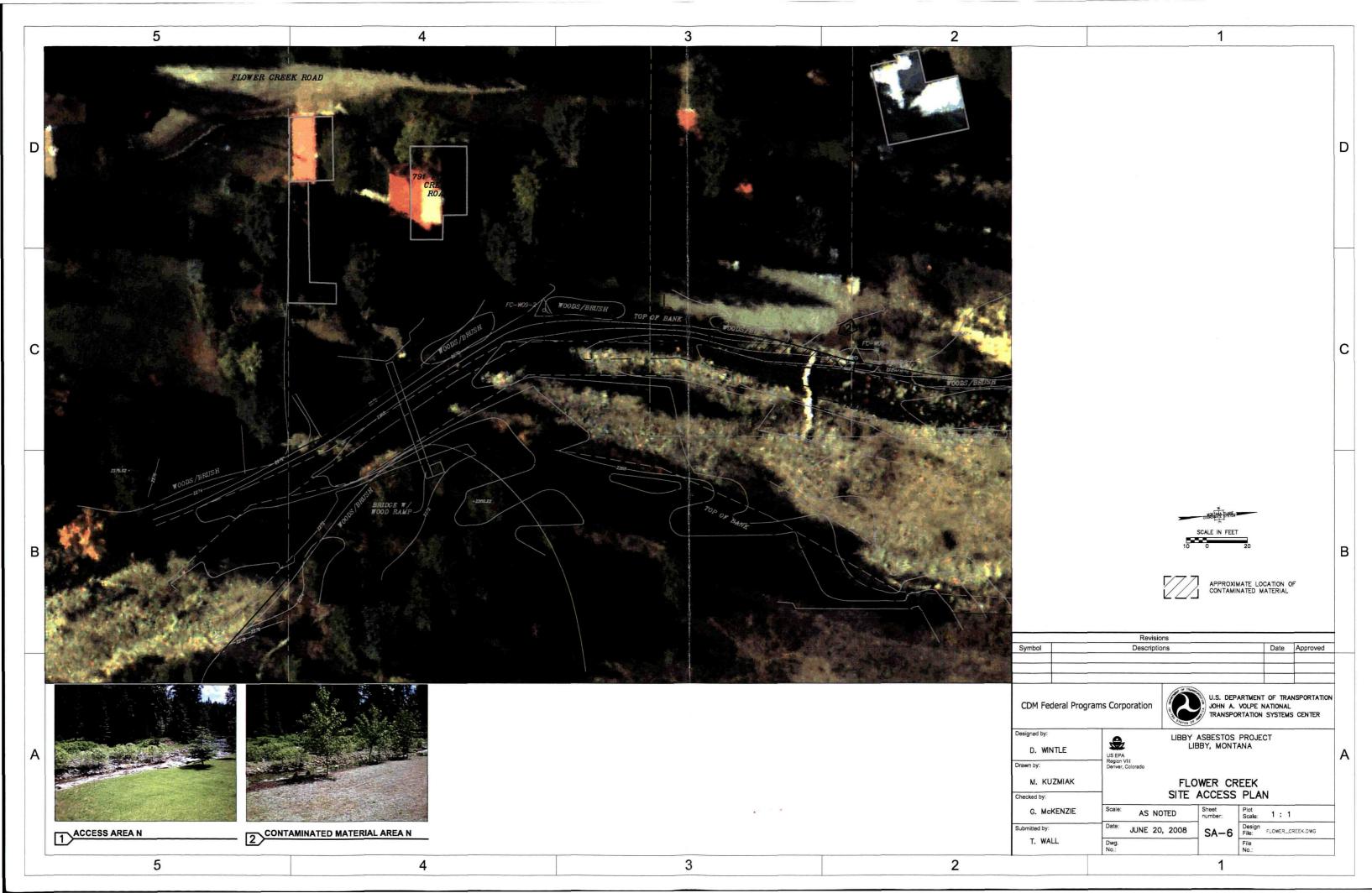


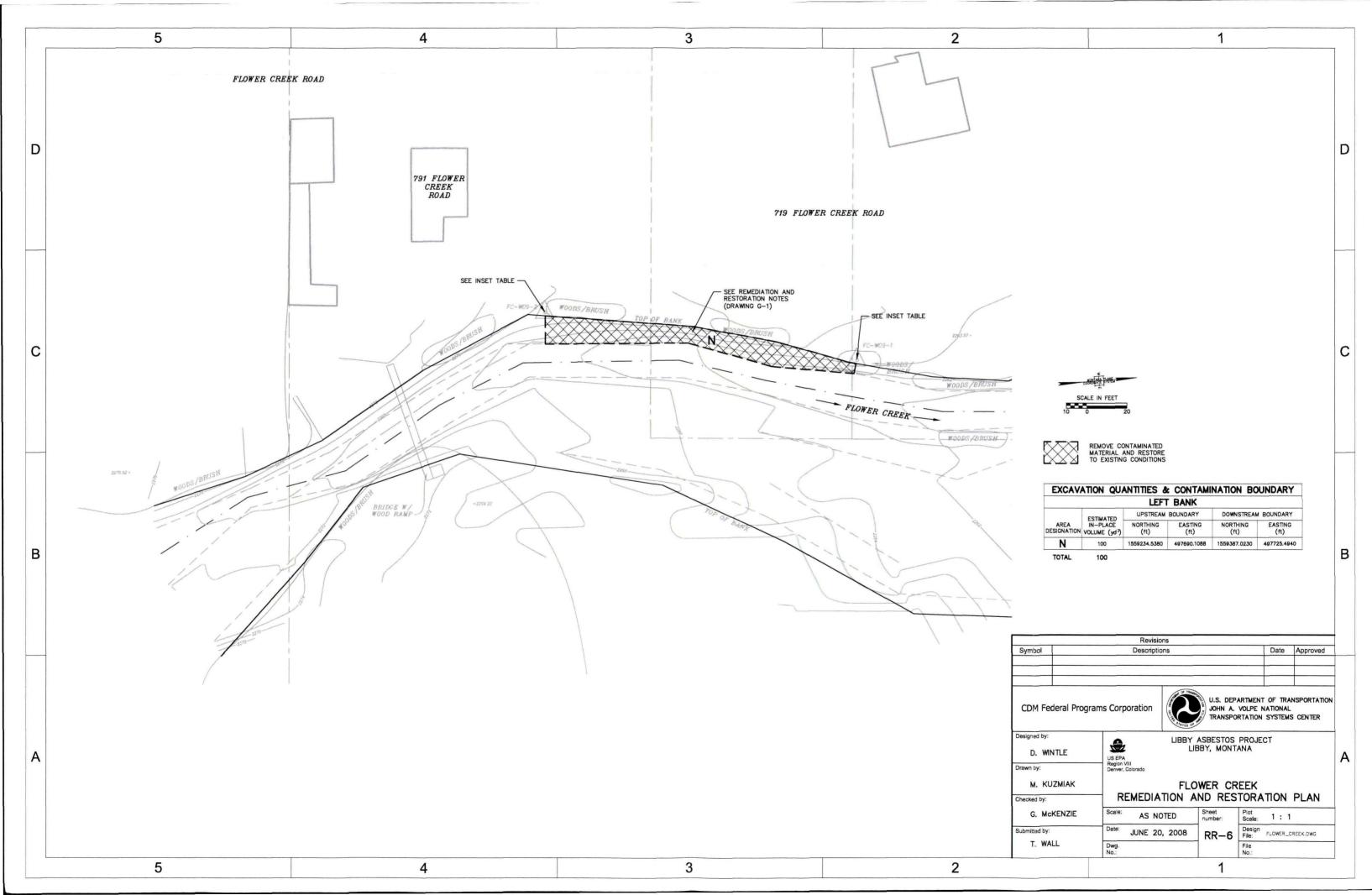












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- 6. THE CONTRACTOR IS RESPONSIBLE FOR ALL PROJECT SAFETY AS DETAILED IN THE GOVERNMENT APPROVED SITE HEALTH AND SAFETY PLAN.
- 7. THE GOVERNMENT WILL OBTAIN AGREEMENTS NECESSARY TO ACCESS PROPERTIES. THE CONTRACTOR IS NOT ALLOWED TO PERFORM WORK ON ANY PROPERTY WITHOUT AN ACCESS AGREEMENT.
- 8. THE CONTRACTOR SHALL HAVE A COPY OF THE PROJECT DOCUMENTS AT THE WORK AREAS AT ALL TIMES.

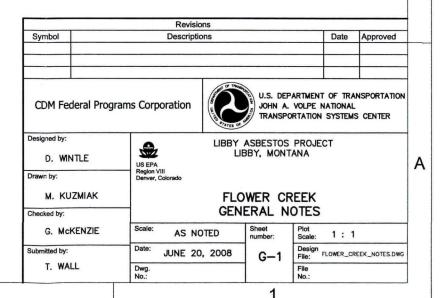
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- 9. THE CONTRACTOR SHALL USE CONSTRUCTION EQUIPMENT THAT IS SUITABLE FOR USE IN A RESIDENTIAL SETTING. THE CONSTRUCTION EQUIPMENT SHALL BE IN GOOD WORKING ORDER AND SHALL BE EQUIPPED TO MEET THE NOISE REDUCTION REQUIREMENTS SPECIFIED IN THE CONTRACT DOCUMENTS.
- 10. NOTES INCLUDED HERE APPLY TO ALL SHEETS UNLESS OTHERWISE NOTED. REFER TO CONTRACT DOCUMENTS FOR ADDITIONAL INFORMATION.

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- 8. THE CONTRACTOR SHALL REMOVE AND DISPOSE ALL CONTAMINATED RIPRAP, AS DIRECTED BY THE GOVERNMENT REPRESENTATIVE. AN ADDITIONAL 6 INCHES OF SOIL BENEATH THE RIPRAP WILL ALSO BE EXCAVATED.
- 9. CONFIRMATION SOIL SAMPLES WILL BE COLLECTED TO DETERMINE EXTENT OF RESIDUAL CONTAMINATION. ADDITIONAL EXCAVATION WILL BE COMPLETED IN ACCORDANCE WITH THE RAWP REVISION 2 AND AS DIRECTED BY THE GOVERNMENT REPRESENTATIVE.
- 10. MISCELLANEOUS CONTAMINATED RIPRAP BOULDERS (AREA I) WILL BE LOCATED BY THE GOVERNMENT REPRESENTATIVE. THESE CONTAMINATED BOULDERS WILL BE REMOVED WITH NO RESTORATION REQUIRED.
- 11. REMOVAL OF CONTAMINATED MATERIAL OUTSIDE OF THE DEFINED BOUNDARY MAY BE REQUIRED AS DETERMINED BY VISUAL INSPECTION AND CONFIRMATION SOIL SAMPLING CONDUCTED DURING EXCAVATION ACTIVITIES. VISUAL INSPECTIONS AND CONFIRMATION SOIL SAMPLING SHALL BE CONDUCTED BY THE GOVERNMENT REPRESENTATIVE.
- 12. ALL MOVEABLE SITE FIXTURES SHALL EITHER BE DISMANTLED/REMOVED, DISPOSED OF, AND REPLACED; OR REMOVED, DECONTAMINATED, AND TEMPORARILY RELOCATED FROM THE INITIAL EXCLUSION ZONE, UNLESS OTHERWISE INDICATED ON THE CONTRACT DRAWINGS. SITE FIXTURES THAT ARE NOT MOVEABLE SHALL BE PROTECTED IN—PLACE.
- 13. ADDITIONAL SITE FIXTURES MAY REQUIRE PROTECTION OR REMOVAL IF EXCAVATIONS EXTEND BEYOND THE INITIAL EXCAVATION LIMITS OR IF THE GOVERNMENT REPRESENTATIVE IDENTIFIES ADDITIONAL SITE FIXTURES DURING CONSTRUCTION. REMOVAL, DISPOSAL, DECONTAMINATION, AND STORAGE OF ANY ADDITIONAL FIXTURES ENCOUNTERED DURING CONSTRUCTION, WHICH MAY OR MAY NOT BE IDENTIFIED ON THE CONTRACT DRAWINGS, SHALL BE HANDLED IN ACCORDANCE WITH THE DESIGN CRITERIA ESTABLISHED IN THE CONTRACT DOCUMENTS.

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